



Clean Air Act Compliance Inspection Report

United States Environmental Protection Agency
Region 10 – Seattle, WA

Full Compliance Evaluation

Bristol Bay Fuels – Dillingham Downtown Terminal Dillingham, Alaska

Inspection Date: August 15, 2022

Report Author Signature

Date

Jon Klemesrud
Enforcement & Compliance Assurance Division
EPA Region 10

Peer Review Signature

Date

John Pavitt
Enforcement & Compliance Assurance Division
EPA Region 10

Section Chief Signature

Date

Derrick Terada
Acting Supervisor, Air & Toxics Enforcement Section
Enforcement & Compliance Assurance Division
EPA Region 10

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1. Facility Information

Facility: Bristol Alliance Fuels, LLC. – Dillingham
dba Bristol Bay Fuels – Dillingham Downtown Terminal

Facility Owner: Bristol Bay Industrial, LLC
Bristol Bay Native Corporation

Physical Address: 309 Main Street East
Dillingham, Alaska 99576

Mailing Address: 5015 Business Park Blvd., Suite 4000
Anchorage, Alaska 99503

AFS/FRS Number: 110070836916

SIC: 5171 (Petroleum Bulk Stations and Terminals)

NAICS: 424710 (Petroleum Bulk Stations and Terminals)

ADEC Air Permit Number: AQ1579PL101

Facility Contacts: Lewis Byrne
Director of Fuels & Terminals
Bristol Bay Fuels
lewisb@bristolbayfuels.com (907) 252-7625

Joe LoSciuto
Bristol Bay Fuels
joe.losciuto@bbindustrial.com (907) 865-5550

2. Inspection Information

Date of Inspection: August 15, 2022

Inspection Start/End Times: 12:00pm – 12:45pm

U.S. EPA Inspector: Jon Klemesrud, Inspector
Field, Data and Drinking Water Enforcement Section (FDDWES)
Enforcement and Compliance Assurance Division (ECAD)
U.S. EPA Region 10

Alaska DEC Inspector: Samantha Hoover
Air Compliance Program
Alaska Department of Environmental Conservation

Inspection Notice: This was an announced inspection. Notification was provided via email on August 5, 2022.

Disclaimer:

Unless otherwise noted, all details in this inspection report were obtained from conversations with Mr. Lewis Byrne or from observations made during the inspection and/or file review. The report is a summary of observations and information gathered, it does not constitute a final decision regarding compliance with CAA regulations or applicable permits, nor is it meant to be a comprehensive summary of all activities and processes conducted at the facility.

This was a full compliance evaluation (FCE) by the U.S. Environmental Protection Agency Region 10 (EPA R10) and the Alaska Department of Environmental Conservation (ADEC). EPA R10 led the inspection. The purpose of the inspection was to identify potential compliance concerns with Federal Clean Air Act (CAA) regulations for Bulk Gasoline Plants and Terminals, specifically to gather information in order to determine if facility is subject to and in compliance with the following federal air rules:

- 40 CFR Part 60 New Source Performance Standards (NSPS)
 - Subpart Kb (Standards for Volatile Organic Liquid Storage Tanks)
 - Subpart XX (Standards for Bulk Gasoline Terminals)
- Part 63 National Emission Standards for Hazardous Air Pollutants (NESHAP)
 - Subpart BBBBBB (Standards for Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities.
 - Subpart CCCCCC (Standards for Gasoline Dispensing Facilities)

3. Facility Background

Bristol Alliance Fuels, LLC dba Bristol Bay Fuels – Dillingham Downtown Terminal (hereinafter referred to as the “Facility”) is a wholly owned subsidiary of Bristol Bay Industrial, LLC, a holding company of Bristol Bay Native Corporation. According to the company’s website (bristolbayfuels.com), the company supplies fuel products, fuel services, and delivery to Western Alaska.

At the time of inspection, the Facility was not in operation and hadn’t reported any throughput since the spring of 2020. Prior to 2019, the Facility was owned and operated by Delta Western Petroleum (Delta Western). In mid-2019, Bristol Alliance Fuels, LLC entered into an agreement to lease the Facility from Delta Western and subsequently purchased the Facility outright in June of 2022.

The Facility is located in downtown Dillingham, Alaska, just north of the Nushagak River. Bristol Alliance Fuels, LLC is headquartered in Anchorage, Alaska. For a general footprint and location, an aerial image from Google Maps® is attached to this report as **Attachment A**. The Facility’s location is just a few miles from the Dillingham Terminal, a separate bulk fuel facility also owned and operated by Bristol Bay Fuels.

The Facility has traditionally stored diesel, heating fuel, aviation and unleaded gasoline, and jet-A fuel. Product is received via barge at the marine cargo headers located at the Facility's dock. Product is then stored at the tank farm and distributed via gravity to the dock or pump to the truck loading rack. The Facility also serves an adjacent a gas station owned and operated by Bristol Alliance Fuels.

The Facility meets the definition of a bulk gasoline plant (as defined in Part 63 NESHAP Subpart BBBBBB) as gasoline throughput has been reported to be less than 20,000 gallons per day.

The Facility operates under an approved Pre-Approved Emission Limit (PAEL) issued in 2019 by ADEC's Air Quality Program for throughput or transfer of less than 19,900 gallons of gasoline per day (**Attachment B**). The permit number associated with the PAEL is #AQ1579PL101.

4. Compliance History

According to EPA's Enforcement Compliance History Online (ECHO¹), the Facility was last evaluated for compliance by ADEC via an off-site partial compliance evaluation (PCE) on February 18, 2022. Based upon my review of compliance data and communications with ADEC, an off-site PCE occurs annually to confirm compliance with ADEC's PAEL requirements [18 AAC 50.230(D)(2)(A, B, and D)]. No enforcement actions or non-compliance had been documented.

5. Inspection Chronology

The inspection was completed in conjunction with a separate inspection of the Bristol Bay Fuels - Dillingham Terminal (AQ1578PL101). Prior to this inspection, I inspected the Dillingham Terminal location. Those inspection findings are documented in a separate report.

This inspection was announced on August 5, 2022. I emailed Mr. Joseph LoSciuto, President of Bristol Alliance Fuels LLC and explained that I had been asked to conduct a routine inspection at both Bristol Bay Fuels Dillingham locations to assess compliance with applicable CAA regulations and the associated ADEC PAEL. Within my email, I also included an EPA brochure that summarizes the requirements of Part 63 NESHAP Subpart BBBBBB. I discussed that a representative of ADEC would be accompanying me on the inspection.

On August 8, 2022, I received a call from Mr. Lewis Byrne, Director of Fuels and Terminals. Mr. Byrne is the on-site manager at the Facility and had received my message via Mr. LoSciuto. Mr. Byrne welcomed the inspection, we agreed on the inspection date/time and briefly discussed safety precautions in advance of the on-site visit.

After concluding the on-site inspection at the Bristol Bay Fuels - Dillingham Terminal location, Samantha Hoover (ADEC) and I reconvened with Mr. Byrne at the Facility to begin the

¹ See <https://echo.epa.gov/>

inspection. The inspection included an opening conference, a records review, a facility walk-through, and a closing conference.

The on-site records review occurred within Mr. Byrne's office, prior to the facility walk-through. Portions of the records review also occurred pre-inspection as discussed in this inspection report. For the facility walk-through, we observed the general footprint, the tank farm, and the truck and marine loading racks. Mr. Byrne accompanied us throughout the inspection, and we are allowed to inspect all areas requested.

6. Opening Conference

In conjunction with the inspection of Bristol Bay Fuels – Dillingham Terminal, the opening conference was held within Mr. Byrne's office, we had our initial introductions, exchanged business cards, I presented my inspector credentials and Ms. Hoover presented her ADEC identification.

I discussed the purpose and expectations of the inspection and provided Mr. Byrne with a copy of the EPA Small Business Resource Information Sheet as well as printed versions of the EPA handouts on Part 63 NESHAP Subpart BBBBBB and Subpart CCCCCC. I also discussed that I would be taking photographs during the walk-through as well as video recordings using EPA's FLIR GF320 gas detection camera.

7. Records Review

A records review was conducted as part of this inspection. I reviewed records to document compliance with Part 63 NESHAP Subpart BBBBBB, Subpart CCCCCC and the 2019 Pre-Approved Emission Limit (PAEL) issued by ADEC for throughput or transfer of less than 19,900 gallons of gasoline per day.

Annual Gasoline Throughput Documentation:

Under the PAEL, ADEC requires the Facility to submit documentation annually of their daily gasoline throughput. Throughput records are due to ADEC by January 31 of each year in the form of a Fuel Usage Report by electronic submission.

Prior to the inspection, in coordination with ADEC, I reviewed Fuel Usage Reports that were submitted to ADEC for 2019, 2020 and 2021. The Facility had documented no throughput since March 16, 2020. For 2019 and 2020, the Facility reported below the PAEL of 19,900 gallons for each day of the calendar year. A copy of the 2019 Fuel Usage Report is attached to this inspection report as **Attachment C**.

Monthly Leak Inspection Documentation:

As the Facility meets the definition of a bulk gasoline plant (gasoline throughput is less than 20,000 gallons per day, defined in Part 63 NESHAP Subpart BBBBBB), §63.11089 of the NESHAP requires each owner/operator to perform a monthly leak inspection of all equipment in gasoline service.

At the time of inspection, Mr. Byrne provided me with a logbook/binder documenting weekly and monthly facility inspections. Inspections are conducted by Mr. Byrne utilizing two separate checklists, the weekly checklist was titled “Weekly Secondary Containment Inspection Form” and the monthly checklist was titled “Dillingham Facility Monthly Inspection Form.” The completed checklists/forms are kept in a Facility binder in Mr. Byrne’s office, records were complete and well organized. Examples of the completed checklists are attached to this inspection report as **Attachment D**, July 2022 Dillingham Facility Monthly Inspection Form and August 2022 Weekly Secondary Containment Inspection Form.

Tank Information:

In order to orient myself on the general Facility layout and tank farm information, I reviewed relevant sections of the Facility’s Oil Discharge Prevention and Contingency Plan prior to the inspection. The plan had been submitted to ADEC and was dated “May 2021.” I reviewed the overall site plan and general tank information which included tank age and capacity. At the time of inspection, I discussed with Mr. Byrne that I had reviewed portions of document and it was confirmed that the tank data within the plan was accurate.

8. Facility Walk-Through

Upon arrival, Mr. Byrne led us on a tour once we arrived at the Facility. Photographs taken during the inspection and a complete photo log are attached to this report as **Attachment E**. Videos taken during the inspection using the FLIR GF320 gas detection camera are documented in a video log attached to this report as **Attachment F**.

As stated earlier in this report, the Facility was not in operation at the time of the walk-through. Operations have been shut down since 2020 which is also indicated on throughput records. Mr. Byrne discussed that as their primary facility (Bristol Alliance Fuels - Dillingham Terminal) is fully active, operations at the Facility is currently non-essential.

The Facility remains locked and gated for restricted access. According to Mr. Byrne, the Facility does continue to utilize Tank #11 for jet-a fuel storage (**Photo 1**), and is also storing small quantities of aviation gasoline, regular unleaded and #2 fuel oil within the tank farm.

Current activities are limited to maintenance and repairs and occasional access to supply the neighboring business (Peter Pan Seafoods) with propane from the Facility’s large onsite propane tanks (**Photo 2**). Mr. Byrne also stated that the Facility hopes to have their adjacent gas station back in service within the next year.

We started the tour just inside the main gate and viewed the out of service truck loading rack (**Photo 3**). When operating, the truck loading rack is used to fill tanker trucks for fuel distribution to customers in the surrounding service area. Fuel is dispensed at the truck loading rack using individual drop tube/downspouts for transfer of product into a truck’s fuel tank. The truck loading rack is not equipped with a vapor recovery system. Bristol Alliance Fuels currently has a fleet of approximately 12 tanker trucks utilized/stored at their other Dillingham location.

After viewing the truck loading rack, we then toured two above-ground gasoline/diesel storage tanks (**Photo 4**) that are used to supply the adjacent gas station when in service. Both the truck loading rack and the gasoline storage tanks were observed with the FLIR GF320 gas detection camera. No vapors/leaks were observed from the equipment gaskets/seals.

We continued the tour and observed the Facility's tank farm. There are eleven vertical storage tanks within the tank farm, four of the eleven were not in use/out of service at the time of inspection. The tanks are welded steel with ladders and connecting bridges/walkways. According to Mr. Byrne, the tanks do not contain internal floating roofs.

See below for tank number, age, and associated product/storage information:

Tank #:	Operational Status:	Capacity (gal.)	Year Built/ Re-Constructed:	Product:
Tank #1	In-Service	89,601	1946	Aviation Gasoline
Tank #2	In-Service	22,610	1946	#2 Diesel/Fuel Oil
Tank #3	In Service	138,752	1946	Gasoline (Regular Unleaded)
Tank #4	Not-in-Service	50,550	1946	N/A
Tank #5	In-Service	50,557	1946	Jet-A Fuel
Tank #6	In-Service	56,759	1950	N/A
Tank #7	In-Service	211,430	1950/1998	Gasoline (Regular Unleaded)
Tank #8	In-Service	127,472	1960/1998	Aviation Gasoline
Tank #9	Not-in-Service	436,722	1962/1998	N/A
Tank #10	Not-in-Service	519,050	1973	N/A
Tank #11	In-Service	541,413	1979/1998	Jet-A Fuel

We first toured the tank farm from ground level, beginning at Tank #1 which had a minimal amount of aviation gasoline product as indicated on the tank gauge (**Photo 5**). We observed the gasket/seals on each tank using the FLIR GF320 gas detection camera, no vapors or leaks were observed. Each gasket/seal appeared to be in working order. Mr. Byrne stated that typically brownish staining or a sheen below is indicative of a minor leak. As indicated earlier in this report, routine Facility inspections are documented on weekly and monthly checklists (**Attachment D**).

We then observed the top of the tanks via the connecting bridges/walkway above (**Photo 6 & Photo 7**), this included observing each tank's pressure relief valve and vent. Looking at the top of the tanks with the naked eye, I did not see any vapors. However, using the FLIR GF320 gas detection camera, vapors were observed coming from the vent/valve in Tank #1 and Tank #11 (**Video 1 – Video 3**). Using the camera's view finder, Mr. Byrne also viewed select vent/valves. Mr. Byrne was not aware of current pressure release settings on the valves or any recent calibration and/or service. It was discussed that venting at Bulk Plants is not prohibited under Part 63 NESHAP Subpart BBBBBB.

After viewing each tank from above, we exited the tank farm and toured the Facility's pump room (**Photo 8**); within the pump room a series pumps are used to supply fuel from the tank farm to the truck loading rack. Using the FLIR GF320 gas detection camera, no vapors/leaks were observed from the equipments gaskets/seals within the pump room.

We then traveled south along the dock and observed the marine loading rack (**Photo 9**) which is used to provide fuel to the marine fishing vessels during the summer months/fishing season. We also viewed the marine cargo input location (**Photo 10**) used to supply product to the Facility via barge. I observed both the marine loading rack and marine cargo input location using the FLIR GF320 gas detection camera, no vapors/leaks were observed from the marine loading rack equipment. We concluded the tour back at the truck loading rack (**Photo 11**) to further observe the drop tube/downspout equipment (**Photo 12**).

9. Closing Conference

Following the facility tour I held a closing conference with Mr. Byrne. We discussed my observations related to the CAA. I explained that I would have to discuss the tank fueling procedures at the truck loading rack with some EPA counterparts and compare against the CAA requirements within Part 63 NESHAP Subpart CCCCCC. I informed Mr. Byrne that I would let him know if any potential compliance concerns were identified post-inspection after my review. I also discussed that I would create a shared OneDrive folder to provide Mr. Byrne access to electronic video files taken during the on-site inspection.

10. Post Inspection Activities

Mr. Byrne and I had a phone conversation on August 16, 2022, I offered to follow-up with an email to Mr. Byrne assisting him with communicating the previous days inspection activities in advance of the inspection report.

On August 17, 2022, I called Mr. Byrne and discussed that I further reviewed Part 63 NESHAP Subpart CCCCCC to compare against observations at the truck loading rack and that I had identified no potential compliance concerns from that part of the Facility.

11. Potential Compliance Concerns

The purpose of the inspection was to identify potential compliance concerns with Federal Clean Air Act (CAA) regulations for Bulk Gasoline Plants and Terminals, specifically to gather information in order to determine if facility is subject to and in compliance with the following federal air rules:

- 40 CFR Part 60 New Source Performance Standards (NSPS)
 - Subpart Kb (Standards for Volatile Organic Liquid Storage Tanks)
 - Subpart XX (Standards for Bulk Gasoline Terminals)
- Part 63 National Emission Standards for Hazardous Air Pollutants (NESHAP)
 - Subpart BBBBBB (Standards for Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities.
 - Subpart CCCCCC (Standards for Gasoline Dispensing Facilities)

No potential compliance concerns were identified as part of this inspection.

ATTACHMENT A

Aerial Image (Google Maps)



ATTACHMENT B

Approved PAEL #AQ1579PL101 ADEC Acknowledgment Letter



THE STATE
of **ALASKA**
GOVERNOR MICHAEL J. DUNLEAVY

AQ1579PL101 2022 Inspection Report
**Department of Environmental
Conservation**

DIVISION OF AIR QUALITY
Air Compliance Program

P.O. Box 111800
Juneau, Alaska 99811-1800
Main: 907.465.5100
Toll free: 866.241.2805
Fax: 907.465.5129
www.dec.alaska.gov

CERTIFIED MAIL: 7018 2290 0001 8578 6051
Return Receipt Requested

May 23, 2019

Bob Cox, President and CEO
Bristol Alliance Fuels, LLC
5015 Business Park Blvd, Suite 4000
Anchorage, AK 99503

Subject: Acknowledgment of Pre-Approved Emission Limits, Permit and Files Nos. Listed Below

Dear Mr. Cox:

On May 14, 2019, the Department received your certified request for three (3) Pre-Approved Emission Limits (PAELs) for throughput or transfer of less than 19,900 gallons of gasoline per day for Bristol Alliance Fuels, LLC, Permit and File Nos. listed in Table A below.

Table A – Approved PAELs

Source Name	Permit Number	File Number
BAF Dillingham	AQ1578PL101	PAL 1578
BAF Dillingham Downtown Terminal	AQ1579PL101	PAL 1579
BAF Naknek Terminal	AQ1580PL101	PAL 1580

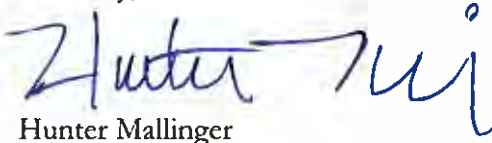
Based on the supplied information, your certified signature, and receipt of administrative fees, the Department acknowledges that the PAELs listed in Table A became effective on May 15, 2019. The limit remains in effect until terminated in accordance with 18 AAC 50.230(e) or until replaced with an Air Quality Control Permit or letter of owner requested limit (ORL) authorization in accordance with 18 AAC 50.230(e).

Please note that daily gasoline throughput records are due annually on January 31 by electronic submission in accordance with 18 AAC 50.230(d)(2)(D)(ii). Forms designed to assist you with these annual reporting requirements are available under the "ORL & PAEL Forms" section on our website:
<http://dec.alaska.gov/air/>.

If you have any questions regarding this letter, please contact Hunter Mallinger at (907) 465-5103 or by email at hunter.mallinger@alaska.gov.

Clean Air

Sincerely,



Hunter Mallinger
Environmental Program Specialist I, Juneau

cc: Jason Olds, ADEC/ACP, Juneau
P. Moses Coss, ADEC/ACP, Fairbanks
Tom Turner, ADEC/ACP, Anchorage

ATTACHMENT C

2019 Fuel Usage Report



**ANNUAL REPORTING FORM
PREAPPROVED EMISSION LIMITS
FUEL USAGE REPORT
GASOLINE DISTRIBUTION FACILITY ***
** 18 AAC 50.230(d)*

FACILITY BAF Dillingham Downtown Terminal

APPLICATION # PAEL AQ1579PL101

REPORTING YEAR 2019

SUBMIT BY JANUARY 31 FOR THE PRECEDING CALENDER YEAR

I, Joseph LoSciuto, the designated Responsible Official of Bristol Alliance Fuels, LLC, certify that I have limited the quantity of daily throughput of gasoline to less than 19,900 gallons. I have recorded the amount of gasoline transferred for each day. Enclosed is a copy of the daily gasoline transfer records required for the preceding year. I have kept the original receipts and records of calculations for this period. I will retain these records for at least five years and will make them available for department inspection upon request. "Based on information and belief formed after reasonable inquiry, I certify that the statements and information in and attached to this document are true, accurate, and complete."

Signature of Facility Responsible Official

1/31/20

Date

Please mail completed form to:

Department of Environmental Conservation
Air Permits Program
610 University Avenue
Fairbanks, AK 99709-3643
Attention: Compliance Technician
(907) 451-5173; (907) 451-2187 (fax)
DEC.AQ.airreports@alaska.gov (email)

DAILY FUEL TRANSFER FORM
PREAPPROVED EMISSION LIMITS (PAEL)
GASOLINE DISTRIBUTION FACILITIES *

** 18 AAC 50.230(d)*

PAEL#: AQ1579PL101

FACILITY Bristol Alliance Fuels, LLC

MONTH **See attachment for daily Fuel Transfers*

MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SATURDAY	SUNDAY

You may choose to record daily Fuel Transfers on this form.

- Limit the quantity of gasoline transferred from tanks at the facility each day to less than 19,900 gallons;
- Record the amount of gasoline transferred from tanks at the facility each day

Daily Fuel Transfers

PAEL

BAF Dillingham Downtown Terminal

2019

AQ1579PL101

(Gallons)

Day	January	February	March	April	May	June	July	August	September	October	November	December
1					-	-	-	-	-	-	-	-
2					-	-	-	-	-	-	-	-
3					24	-	-	-	-	-	-	-
4					122	-	-	-	-	-	-	-
5					-	-	-	-	-	-	-	-
6					-	-	-	-	-	-	-	-
7					250	-	-	-	-	-	-	-
8					-	-	-	-	-	-	-	-
9					-	-	-	-	-	-	-	-
10					-	-	-	-	-	-	-	-
11					-	-	-	-	-	-	-	-
12					-	-	-	-	-	-	-	-
13					-	-	-	-	-	-	-	-
14					34	-	-	-	-	-	-	-
15					-	-	-	-	-	-	-	-
16				56	32	-	-	-	-	-	-	-
17				-	48	-	-	-	-	-	-	-
18				-	-	-	-	-	-	-	-	-
19				-	-	-	-	-	-	-	-	-
20				-	7	-	-	-	-	-	-	-
21				-	62	-	-	-	-	-	-	-
22				128	249	-	-	-	-	-	-	-
23				-	-	-	-	-	-	-	-	-
24				25	-	-	-	-	-	-	-	-
25				775	23	-	-	-	-	-	-	-
26				-	-	-	-	-	-	-	-	-
27				19	-	-	-	-	-	-	-	-
28				-	58	-	-	-	-	-	-	-
29				1,822	-	-	-	-	-	-	-	-
30				666	526	-	-	-	-	-	-	-
31				-	-	-	-	-	-	-	-	-

*Note: BAF took over operations of this facility from Delta Western on 4/16/19. Therefore, we do not have any data for this facility before this date.

ATTACHMENT D

July 31, 2022 Monthly Checklist & June 2022 Weekly Inspection Form

DILLINGHAM FACILITY MONTHLY INSPECTION FORM

ITEM NO.	DILLINGHAM FACILITY INSPECTION ITEM	Satisfactory Condition		CORRECTIVE ACTIONS TAKEN
		SC	DC	
	TANK YARD:			
1	Fencing in place, upright without sagging	X		
2	Emergency notification and restricted access signs posted near entrance	X		
3	No smoking signs posted around fencing perimeter	X		
4	Perimeter lighting functioning	X		
5	Stairways clear of obstruction and have handrails	X		
6	Fire extinguishers located every 75' and mounted off ground	X		
	EXTERNAL SURFACE OF TANK ISSUES:			
7	Visual signs of leaks, drip marks, or discoloration	X		
8	Visual signs of tank shell distortions, damage, or discoloration	X		
9	Visual signs of tank settlement, gaps between tank & foundation		X	Went order in for sigt to make tank #10, painting scheduled in fall paint added
10	Visual signs of paint coating damage or deterioration		X	
11	Visual signs of tank foundations damage or deterioration	X		
12	Visual signs of dirt, rocks, or vegetation on tank chimneys	X		
13	Visual signs of damage or deterioration to tank attachments	X		
14	Visual signs of damaged or missing ground wires or straps	X		
15	Inspect fixed scaffold support for corrosion or wear	X		
16	Check condition of screen on rim vent covers	X		
17	Check tightness of flanges, bolts, and valves	X		
18	Valves operational	X		
18.5	Visually inspect leak detection ports	X		
	STORAGE TANK OVERFILL PROTECTION SYSTEM:			
19	Tank level gauges working	X		
19.5	Test level gauges by turning checking knob	X		
20	High level alarms tested and working	X		
	PRESSURE RELIEF VALVE ISSUES:			
21	Ensure pressure relief bypass valve in open position	X		
22	If pressure relief bypass valve is closed, ensure its tagged out	X		
	SECONDARY CONTAINMENT ISSUES:			
23	debris and vegetation and excessive water removed	X		
24	proper alignment and operation of drain valves, if any	X		
25	visible signs of oil leaks or spills	X		
26	defects of containment system – rips, protrusion, delaminate, rot etc.	X		
	PIPING SUPPORT ISSUES:			
27	Pipes sagging from lack of adequate support	X		
28	Pipes without support near tank nozzle	X		
29	Pipe support damage, deterioration, misalignment or corrosion	X		
30	Pipe support legs not in contact with pipe support	X		
31	Pipe support foundations/structures that have shifted, raised or settled	X		
32	Pipe support brackets loose	X		

INSTRUCTIONS: inspect every item. Note deficiencies. Make repairs immediately or notify supervisor. Order damaged or missing items immediately.

NOTES:

INSPECTED BY:

DATE:

7-31-22

WEEKLY SECONDARY CONTAINMENT INSPECTION FORM

LOCATION: DILLINGHAM MONTH OF: August, 2022

	WEEK 1	WEEK 2	Week 3	WEEK 4	WEEK 5
Debris and vegetation	S	S			
❖ Proper alignment and operation of drain valves	S	S			
Visible signs of oil leaks or spills	S	S			
Defects or failures of containment system	S	S			
Inspected By:	VP	W			

Instructions:

- Rate each item.
 - S Satisfactory condition/working as designed
 - U Unsatisfactory/ needs corrective action
 - ❖ NA Not Applicable (applies to proper alignment and operation of drain valves only)
- Include description of corrective actions taken or needed and date closed.
- Report significant discrepancies to operations or environmental departments
- Inspector signature at the bottom of the column for each week.
- Send completed form to Anchorage with monthly facility inspection forms.

Reference: 18 AAC 75.075(c)

Retain 5 years.

ATTACHMENT E

Photograph Log

All photographs taken by Jon Klemesrud on August 15, 2022

Nikon Coolpix AW100

Photo Log – Bristol Bay Fuels – Dillingham Downtown Terminal



Photo #:01 (DSCN2681)
Description: Facing south/southwest, photo of Tank #11.



Photo #:02 (DSCN2682)
Description: Facing west, photo of propane tanks on-site.

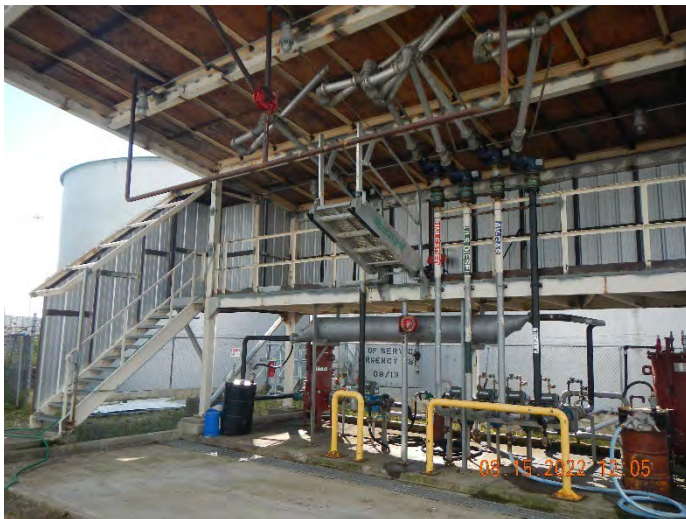


Photo #:03 (DSCN2683)
Description: Facing south/southeast, photo of Facility's truck loading rack.



Photo #:04 (DSCN2684)
Description: Facing east, photo of storage tanks used to supply gas station.

Photo Log- Bristol Bay Fuels – Dillingham Downtown Terminal



Photo #:05 (DSCN2685)
Description: Tank #1 gauge.



Photo #:06 (DSCN2686)
Description: Facing east, photo of the tank farm from the top of Tank #8.



Photo #:07 (DSCN2687)
Description: Facing east, photo of the top of Tank #8 and tank farm in the background.



Photo #:08 (DSCN2688)
Description: Photo of inside the pump room.

Photo Log- Bristol Bay Fuels – Dillingham Downtown Terminal



Photo #:09 (DSCN2689)
Description: Facing north, photo of the marine pump lines.



Photo #:10 (DSC2690)
Description: Facing north, photo of the marine intake lines.



Photo #:11 (DSCN2691)
Description: Facing east, photo of the truck loading rack.



Photo #:12 (DSCN26792)
Description: Facing east, photo of the drop tube /downspouts at the truck loading rack.

ATTACHMENT F

Video Log

All videos taken by Jon Klemesrud on August 15, 2022

FLIR GF320 (w/24mm lens)

	Date	Time (24 Hr) (AKDT)	Location/Activity Description	Vapors Observed w/FLIR? (Y/N) ¹	Video Clip No.	Initials
Video #1	8/15/2022	12:20PM	Tank#11 vent	Y	MOV_0886.mp4	JK
Video #2	8/15/2022	12:22AM	View of tank farm from Tank #11	Y	MOV_0887.mp4	JK
Video #3	8/15/2022	12:26AM	Tank #1 pressure relief valve	Y	MOV_0888.mp4	JK

¹Yes (Y) indicates a visible plume of vapors was clearly observed with the FLIR camera. No (N) indicates vapors were not present or not clearly observed with the FLIR camera.